IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

DONALD BERDEAUX and CHRISTINE GRABLIS, Individually and on Behalf of All Others Similarly Situated,

Plaintiffs,

-against-

ONECOIN LTD.; RUJA IGNATOVA, KONSTANTIN IGNATOV; SEBASTIAN GREENWOOD; MARK SCOTT; IRINA ANDREEVA DILINSKA; DAVID PIKE; and NICOLE J. HUESMANN,

Defendants.

Case No.: 1:19-cv-04074-VEC

Hon. Valerie E. Caproni

PLAINTIFFS' NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE AS TO DEFENDANTS SEBASTIAN GREENWOOD AND IRINA ANDREEVA DILINSKA

Lead Plaintiff Donald Berdeaux ("Berdeaux") and Plaintiff Christine Grablis ("Grablis" and together with Berdeaux, "Plaintiffs"), by and through their undersigned counsel and pursuant to Fed.R.Civ.P. 41(a)(1)(A)(i), hereby give notice that this action shall be, and is, DISMISSED WITHOUT PREJUDICE <u>only as between Plaintiffs and Defendants Sebastian Greenwood</u> ("Greenwood") and Irina Andreeva Dilinska ("Dilinska").

This Notice of Voluntary Dismissal is not intended to, and shall not have, any effect on any claims asserted by any other parties to this litigation, or the defenses to those claims. Likewise, the dismissal of Plaintiffs' claims without prejudice as to Defendants Greenwood and Dilinska will have no impact or effect on the ability of any Plaintiff or putative class member to file a complaint asserting any claims against Greenwood or Dilinska in the future; as neither Greenwood nor

Dilinska have filed an Answer or a motion for summary judgment in response to the claims lodged against them in this Action.

For the avoidance of doubt, no compensation in any form has passed directly or indirectly from Defendants Greenwood and Dilinska to Plaintiffs or their attorneys; and no promise, understanding, or agreement to give any such compensation has been made.

Moreover, no class has been certified in the Action.

Dated: February 28, 2020 Respectfully Submitted

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Attorneys for Plaintiffs Donald Berdeaux and Co-Lead Counsel for the Class

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was electronically filed with the Clerk of Court of this 28th day of February 2020 by using the CM/ECF system and that a true and correct copy will be served via electronic mail to: STEVEN GLEN MINTZ, ESQ., KEVIN MICHAEL BROWN, ESQ., and TIMOTHY JOSEPH QUILL, JR., ESQ., Mintz & Gold LLP, Counsel for Defendant Mark Scott, 600 Third Avenue, 25th Floor, New York, NY 10016; E-mail: Mintz@mintzandgold.com; Brown@mintzandgold.com; Quill@mintzandgold.com; JEFFREY HARRIS LICHTMAN, ESQ. and JEFFREY BENSON EINHORN, ESQ., Law Offices of Jeffrey Lichtman, Counsel for Defendant Konstantin Ignatov, 11 E. 44th Street, Ste. 501, New York, NY 10017; E-mail: Jl@jeffreylichtman.com; Einhorn@jeffreylichtman.com; MARTIN R. **RASKIN, ESQ.**, Raskin & Raskin, P.A., Counsel for Defendant David Pike, 201 Alhambra Circle, Suite 1050, Coral Gables, FL 33134; E-mail: Mraskin@raskinlaw.com; BRADLEY A. SILVERMAN, ESQ., Counsel for Defendant Nicole J. Huesmann, Hamilton, Miller & Brithisel LLP. 150 Southeast Second Avenue, Suite 1200, Miami, FL 33134; mail:Bsilverman@hamiltonmillerlaw.com.

> s/ Adam M. Apton Adam Apton